



Proposed guidance on wind-down planning

ICAEW welcomes the opportunity to comment on the guidance consultation 16/5 *Proposed guidance on wind-down planning* published by Financial Conduct Authority on 23 May 2016, a copy of which is available from this [link](#).

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MAJOR POINTS

We have read the proposed guidance with interest and are in agreement with the ethos of the principles and seek only to make a limited number of points.

Wind-down processes are only considered when a firm's governing body decides to wind down its regulated business and the firm is no longer a going concern. We feel that in the guidance document the regular reference to a "going-concern" scenario could potentially be confusing. We recommend that it should be emphasised that the wind-down procedures apply to "gone-concern" situations, even if planning and watching early indicators are essential for orderly wind-downs.

We also think that it would be helpful for the FCA to clarify whether the guidance proposal is intended to become a guidance or a requirement to be followed by all regulated firms.

ICAEW supports the development of principled, wide application guidance, which does not detract from the ability of professionals to use their judgement and experience to consider a particular set of circumstances.